

REMARKS/ARGUMENTS

Reexamination of the captioned application is respectfully requested.

A. SUMMARY OF THIS AMENDMENT

By the current amendment, Applicants basically:

1. Editorially amend dependent claims 7 and 8 in non-narrowing ways to moot the objections thereto.
2. Amend independent claims 1 and 11.
3. Respectfully traverse all prior art rejections.

B. PATENTABILITY OF THE CLAIMS

Claims 1-2, 5, 7-8, 10-11, and 16-18 stand rejected under 35 USC §103(a) as being unpatentable over U.S. Patent 7,139,556 to Marley in view of WO 01/28273 to Lammi et al and U.S. Publication 2004/0117370 to Dutta et al. Claims 3, 4, 13 and 14 stand rejected under 35 USC §103(a) as being unpatentable over U.S. Patent 7,139,556 to Marley in view of WO 01/28273 to Lammi et al, U.S. Publication 2004/0117370 to Dutta et al and further in view of U.S. Publication 2003/0115201 to Krishnamoorthy. Claims 9 and 15 stand rejected under 35 USC §103(a) as being unpatentable over U.S. Patent 7,139,556 to Marley in view of WO 01/28273 to Lammi et al, U.S. Publication 2004/0117370 to Dutta et al and U.S. Publication 2003/0016823 to Chung. All prior art rejections are respectfully traversed for at least the following reasons.

The final office action compounds the alleged obviousness rejection with the newly applied U.S. Publication 2004/0117370 to Dutta et al., allegedly to address the claim limitation directed to Applicants' permission table. Yet Applicants still deem the rejection to be defective.

As previously emphasized, Applicant's independent claims are directed to protecting user data from being supplied to unauthorized service providers (*see*, for

example, specification page 4, lines 4-11). In contrast, Morley¹ provides location dependent services, with the object of protecting the user's identity in a mobile network from being revealed to any service providers. Morley does not check whether the ASP is authorized to receive the requested location information. Any ASP could thus send a user data request to the network, referring to the user tag, and receive user data regardless of whether that ASP is allowed to see that user data or not. Therefore, the Morley user has no control of what data is disclosed to whom.

Both Lammi and Marley protect the user's identity from being revealed to the service provider. The user has thus no control of what data is disclosed to whom in Marley and Lammi. The technology of Applicant's independent claims, on the other hand, protect user data from being supplied to unauthorized service providers. Applicant's technology is not taught or suggested in either Lammi or Marley. Therefore, the skilled person cannot arrive at the claimed invention by combining the teachings of Lammi and Marley.

¹ Morley describes that a service request from a user to an application service provider "ASP" is intercepted by the network. The network then then generates (step C) an encoded or encrypted "user tag" comprising identifications of the user and the ASP who needs to know the location of the user (*see, e.g.,* Moreley cal. 3, lines 35-45). Morley also mentions (col. 4, lines 46-50) that the tag could be a random number associated with "the specific four components", which includes the user and ASP identifications. The Morley network then passes the user tag to the ASP (step D) without revealing the user's identity. The ASP can then obtain location information from the network referring to the received user tag (steps E,F).

As now amended, independent claims 1 and 11 require that the permission table specify a plurality of individual service applications and the types of data each individual application is allowed to receive. Such amendment is supported by Applicant's description of his permission table 212 (e.g., translation table), an example of which (showing individual service applications in its third column) is shown at the top of page 12 of the specification. Such amendment distances the independent claims even further from the concocted combination with Dutta.

Referring to [0108]- [0111] and Fig. 9A of Dutta, the office action alleges that it is obvious to simply combine all three documents Marley, Lammi and Dutta and thereby obtain the invention defined in claims 1 and 11. Applicant disagrees.

Dutta discloses that an "accessibility permission look-up table" is used to identify access permissions for various requesters that request access to an "accessibility database", see [0106]- [0107]. Among other things, the requester could be a service provider and the requested data could be user-specific. However, the look-up table described in Dutta only specifies access permissions for different types of requesters collectively, but not for specific requesters individually, such that any service providers (being one type of requester) all have the same access permissions to different types of data, which is not the case in the subject matter of independent claims 1 and 11.

In the above regard, Dutta's Fig. 9A illustrates a look-up table, where row 920 indicates that (any) service providers are permitted to retrieve "accessibility privilege information corresponding to a user identifier", according to column 955 in the table, see also [0109]. Clearly, the table does not control access permissions for individual service providers, as defined in independent claims 1 and 11.

Moreover, Dutta does not teach several other features in claims 1 and 11 which, as explained above, are still lacking from the Marley/Lammi combination. Nor does Dutta teach use of anything comparable to Applicant's AUID code.

C. MISCELLANEOUS

In view of the foregoing and other considerations, the Examiner has ample bases for withdrawing all rejections and for allowance of all pending claims. Accordingly, a formal indication of allowance is earnestly solicited.

The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for entry of these papers and the continued pendency of the captioned application.

Should the Examiner feel that an interview with the undersigned would facilitate allowance of this application, the Examiner is encouraged to contact the undersigned.

Respectfully submitted,

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